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9 SUPER LUCKY CASINO INC.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 DAN VIGDOR, an individual; STEPHEN
14 BRADWAY, an individual,

15 Plaintiffs,

16 v.

17 SUPER LUCKY CASINO INC., a
California corporation (formerly known as
18 12 GIGS, INC.); DOES 1-50, inclusive,

19 Defendants.
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Case No. 4:16-cv-5326 HSG

**JOINT GOOD CAUSE STATEMENT,
REQUEST AND ORDER TO EXTEND
CASE DEADLINES**

Judge: Hon. Haywood S. Gilliam, Jr.

Date Filed: September 1, 2016

Trial Date: September 17, 2018

1 The undersigned parties to this action, by and through their undersigned counsel, hereby
2 request that the Court amend the case schedule as follows and provide the following
3 particularized reasons showing good cause for the requested changes pursuant to the Court's
4 Standing Order for Civil Cases:

5 On August 4, 2017, the parties stipulated to and the Court ordered a case schedule.
6 Dkt. 64. On January 16, 2018, Plaintiffs filed a motion for leave to file a Fourth Amended
7 Complaint that adds seven new causes of action and two individual defendants, Dkt. 82, which
8 the Court granted on April 13, 2018, Dkt. 91. The new claims in the Fourth Amended Complaint
9 include breach of contract, fraudulent concealment, conversion, libel, intentional interference
10 with contractual relations, breach of fiduciary duty, and breach of the implied covenant of good
11 faith and fair dealing. *See* Dkt. 92-4. In response to the Court's guidance at the hearing on
12 Plaintiffs' motion for leave to file a Fourth Amended Complaint, the parties met and conferred
13 regarding the current case schedule.

14 In light of the order granting Plaintiffs' leave to file the Fourth Amended Complaint, the
15 parties agree that additional discovery is necessary and hereby request to extend the trial date and
16 related case deadlines approximately 90 days given the expanded scope of the case. Further, the
17 parties agree that Defendants will not bring a motion to dismiss, but instead will combine their
18 motion to dismiss with their summary judgment motion. Moreover, the parties agree that
19 Defendants can each serve one set of written discovery requests (requests for production,
20 interrogatories and requests for admission). The parties will then meet and confer to discuss
21 whether further discovery is necessary for either party. The parties agree discovery will be
22 limited to Defendants' written discovery mentioned above unless otherwise stipulated after the
23 meet and confer.

24 IT IS HEREBY REQUESTED that, subject to the Court's approval or setting of
25 alternative dates consistent with the Court's calendar, the following case schedule shall govern:
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Event	Current Deadline	Proposed New Deadline
Deadline for Completion of Fact Discovery	N/A	June 29, 2018

Dispositive Motions Filing Deadline	May 18, 2018	August 17, 2018
Oppositions to Dispositive Motions Filing Deadline	June 1, 2018	August 31, 2018
Replies In Support of Dispositive Motions Filing Deadline	June 8, 2018	September 7, 2018
Dispositive Motion Hearing Date	June 28, 2018 at 2:00 p.m.	September 27, 2018 at 2:00 p.m.
Exchange Witness Lists and Citations to Evidence	August 8, 2018	October 30, 2018
Motions in Limine Filing Deadline	August 14, 2018	November 6, 2018
Joint Pretrial Statement and Proposed Order, Proposed Jury Instructions, Voir Dire Questions, Verdict Forms, Statement of Case, Trial Briefs, and Oppositions to MIL Filing Deadline	August 21, 2018	November 13, 2018
Pretrial Conference	September 4, 2018 at 3:00 p.m.	November 27, 2018 at 3:00 p.m.
Trial	September 17, 2018 @ 8:30 a.m.	December 10, 2018 @ 8:30 a.m.

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories have concurred in its filing.

Dated: April 24, 2018

KEKER, VAN NEST & PETERS LLP

By: /s/ Benedict Y. Hur
BENEDICT Y. HUR
JULIA L. ALLEN
SHAYNE HENRY
SARAH SALOMON

Attorneys for Defendant
SUPER LUCKY CASINO INC.

Dated: April 24, 2018

MICHELMAN & ROBINSON, LLP

By: /s/ Marc R. Jacobs
SANFORD L. MICHELMAN
MARC R. JACOBS
ROBERT D. ESTRIN
Attorneys for Plaintiffs
DAN VIGDOR and
STEPHEN BRADWAY

ORDER

Pursuant to the joint request of the parties, and for good cause shown, the case schedule is amended as follows:

Event	Current Deadline	Proposed New Deadline
Deadline for Completion of Fact Discovery	N/A	June 29, 2018
Dispositive Motions Filing Deadline	May 18, 2018	August 17, 2018
Oppositions to Dispositive Motions Filing Deadline	June 1, 2018	August 31, 2018
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Pretrial Conference	September 4, 2018 at 3:00 p.m.	November 27, 2018 at 3:00 p.m.
Trial	September 17, 2018 @ 8:30 a.m.	December 10, 2018 @ 8:30 a.m.

IT IS SO ORDERED.

Dated: April 25, 2018


HON. JUDGE HAYWOOD S. GILLIAM, JR.